

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IAN L. LAND,

Plaintiff,

Case No.: 22-cv-12672

Hon. Matthew F. Leitman

-VS-

CITY OF DETROIT, a municipal  
corporation; RYAN RULOFF, individually  
and in his official capacity; and MATTHEW  
WEBB, individually and in his official  
capacity

Defendants.

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Ivan L. Land (P65879)  
Law Offices of Ivan L. Land, P.C.  
25900 Greenfield Rd., Ste. 210  
Oak Park, MI 48237-1267  
(248) 968-4545

Philip J. Hiltner (P77913)  
City of Detroit Law Department  
Attorney for Defendant City of Detroit  
2 Woodward Ave., Ste. 500  
Detroit, MI 48226  
(313) 237-6390

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**PLAINTIFF'S RESPONSE TO DEFENDANTS' SECOND DISCOVERY  
REQUESTS**

Plaintiff submits the following as a response to Defendant's Second  
Discovery Requests.

**INTERROGATORIES**

1. Please provide contact information for Dusty Dellinger.

**ANSWER:**

*Plaintiff does not have this information.*

## REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all employment records, including, but not limited to, proof of income, from the Law Offices of Ivan L. Land, P.C.

**ANSWER:**

*Plaintiff will provide at a later date.*

2. Please produce your income log mentioned in your deposition.

**ANSWER:**

*Plaintiff will provide at a later date.*

3. Please produce all proof of income stored in your **Arbiter Sports account**.

**ANSWER:**

2023- \$18163

2022-\$6591

2021-\$70

4. Please produce every IRS Form 1099 you have received in the past seven years.

**ANSWER:**

*Plaintiff will provide at a later date.*

5. Please produce any bills/invoices you have received from Attorney Stephanie Carson.

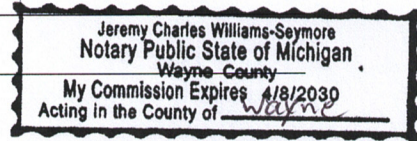
**ANSWER:**

None.

STATE OF MICHIGAN )  
 ) SS.  
COUNTY OF Wayne

The foregoing instrument was acknowledged before me on Feb 21<sup>st</sup>, 2024 by **Ian L. Land** known to me to be the person(s) described in and who executed the instrument.

My commission expires:



*Jan J. Ladd*

Notary Public

Wayne County,  
Michigan